

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

JUL 05 2023

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Michael Mayo

Plaintiff,

v.

Case No: 1:21-cv-05014  
Honorable M. David Weisman

Tom Dart

Defendant.

Plaintiff's Motion Requesting Deposition  
Of Essential Persons

1. Michael Miller is the Executive Director of the Cook County Department of Corrections.
2. Director Miller played an intricate roll in planning and developing protocols to combat the COVID-19 pandemic in the Cook County Jail.
3. Director Miller provided testimony in Mayo v. Dart (case No. 20 C 2134) defending the Cook County Jails response to the COVID-19 pandemic.



4. For the above reasons plaintiff believes director Miller should be available to depose.
5. Forrest Petersen was a pretrial detainee who was housed in Division 8(RTU) tier 3G and 3F with plaintiff during the COVID-19 pandemic.
6. Forrest Petersen was tested for COVID-19 on April 17, 2020 along side plaintiff and both Mr. Petersen and plaintiff tested positive for COVID-19.
7. Forrest Petersen's contact information is:  
986 North Village Drive Apt. 2  
Round Lake Beach, IL 60073
8. Forrest Petersen's phone # is 773-339-1179.
9. Plaintiff prays that the Honorable Judge M. David Weisman grants plaintiff's motion request to depose Director Michael Miller and Forrest Petersen.



Sincerely,

Michael C. Mayo

Michael C. Mayo  
20181127027  
2700 S. California  
Chicago, IL 60608

CERTIFICATE OF SERVICE

The undersigned states that on June 28, 2023,  
Plaintiff's Motion Requesting Deposition Of Essential Persons  
were served via United States Postal Service to the  
stated address below.

Michael C. Mayo

Troy S. Radunsky  
De Vore Radunsky  
230 West Monroe Suite 230  
Chicago, IL 60606

Hon. M. David Weisman  
Office Of Clerk Of The U.S. District Court  
United States Courthouse  
219 South Dearborn Street  
Chicago, IL 60604



Michael Mayo  
20181127027  
2700 S. Califormia  
Chicago, IL 60608

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Hon Judge M. David Weisman  
United States Courthouse  
219 South Dearborn Street  
Chicago, IL 60604

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